

FILED - KZ

April 8, 2022 1:53 PM

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

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United States of America,
Plaintiff,

V.

Roberto ESPINOZA Farias,
Defendant.

Case No. 1:08-cr-274-21

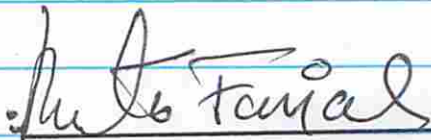
Hon. Paul L. Maloney

Motion For:
Compassionate Release.

Good day your Honor,

I am writing this motion seeking Compassionate Release under section 603 of the First Step Act. Compassionate Release is based on health conditions or other extraordinary and compelling reasons. A prisoner's increased Susceptibility to severe illness or death from covid-19 due to health conditions or age is an extraordinary and compelling reasons. Since I have been in the Bop I have been diagnosed with prostate and I am taking Doxazosin-4mg, Diabetes and taking Glipizide 5mg and Meta Morfin-1000 mg, Arthritis and taking Urloxioam 15mg, Blood pressure and taking Lisinopul 2.5 mg, Liver & Kidney problems and taking Asprin-81mg, Cholesterol and taking Atorvastatin-10 mg, Glaucoma and taking Latanoprost Ophthalmic Solution-0.005% and Timolol maleate-0.5%. Since I have been in the Bop I have completed a number of courses with a total 20 including Drug Education Course and GED Course. I am also with a 100% clean record with

good conduct. I am also adding to this motion that my Sentencing guidelines would change if i were to be sentenced today. The reason for me saying so is, The First Step Act changed the definition of serious drug felony. To Count a drug crime must have involved a sentence served of more than 12 months and must have finished serving that sentence less than 15 years before the current charge. Although my indictment says that the conspiracy i joined took place from the mid-1990's to Sometime in 2009, i did not join the conspiracy until 2003. (See PSR, P68) This means that neither of my prior drug convictions would not count for criminal history purposes, nor could they be used to enhance my sentence under 21 U.S.C § 851. Your Honor, with all the information that i provided here and collaborating data in the Bop log, i am asking you Sir, to please grant my motion for compassionate release because of my illness and my age making me a greater risk for Severe illness from Covid-19, especially with the recent surge and outbreaks in the facility. I am also of no treat to Society as i am fully rehabilitated. Thank you Sir Have a blessed day.

Signature: 
Roberto Espinosa Farias.

3-4-2022

Roberto Farias

74198-012

MDC Guaynabo

P.O. Box 2005

Catano, P.R. 00963

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Legal Mail.



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49007-375799



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